

## EXHIBIT B

**Subject:** Re: following up re: Broadwater

**Date:** Friday, March 20, 2020 at 9:10:55 AM Mountain Daylight Time

**From:** Jackie Rolleri - NOAA Federal

**To:** David G. Concannon

**CC:** Brian Wainger, Kent.Porter@usdoj.gov, bargerd\_gtlaw.com, William Poynter

Hi David,

Ole retired from NOAA so he is no longer an employee of the agency. If RMST has no concerns with Broadwater discussing Titanic with Craig, then I'll assume the same is true for our other employees who work on this matter, including Dave Alberg.

Best,  
Jackie

On Fri, Mar 20, 2020 at 11:06 AM David G. Concannon <[david@davidconcannon.com](mailto:david@davidconcannon.com)> wrote:

Hi Jackie,

Actually, the number is three: Ole Varmer, David Alberg and Craig McLean.

I believe Ole's discussion was just a comment in passing. David Alberg and John agreed not to talk about the Titanic or Titanic 2020. John and Craig are free to talk about anything they want.

Sincerely,

David G. Concannon

Concannon & Charles

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**From:** Jackie Rolleri - NOAA Federal <[jackie.rolleri@noaa.gov](mailto:jackie.rolleri@noaa.gov)>  
**Date:** Friday, March 20, 2020 at 8:53 AM  
**To:** David Concannon <[david@davidconcannon.com](mailto:david@davidconcannon.com)>  
**Cc:** Brian Wainger <[bwainger@kaleolegal.com](mailto:bwainger@kaleolegal.com)>, "Kent.Porter@usdoj.gov" <[Kent.Porter@usdoj.gov](mailto:Kent.Porter@usdoj.gov)>, "barger\_d\_gtlaw.com" <[barger\\_d\\_gtlaw.com](mailto:barger_d_gtlaw.com)>, William Poynter <[wpoynter@kaleolegal.com](mailto:wpoynter@kaleolegal.com)>  
**Subject:** Re: following up re: Broadwater

Thanks, David.

To clarify, John Broadwater has contacted two of our employees, who are former colleagues and friends of his, for the purpose of discussing Titanic and the potential 2020 expedition. Before our folks respond, I want to ensure that there are no concerns with NOAA discussing such matters with Broadwater (versus just catching up generally with friends/colleagues).

Thanks,

Jackie

On Wed, Mar 18, 2020 at 9:54 PM David G. Concannon <[david@davidconcannon.com](mailto:david@davidconcannon.com)> wrote:

Hi Jackie,

John Broadwater, Ph.D. is working as the project archaeologist for RMST's Titanic 2020 Expedition. We understand that he has incidental contact with his friends and former colleagues at NOAA, and this is fine with us.

Please make sure that you and Mr. Porter include me in your communications with RMST's attorneys. Thank you.

Sincerely,

David G. Concannon

Concannon & Charles

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From: **Jackie Rolleri - NOAA Federal** <[jackie.rolleri@noaa.gov](mailto:jackie.rolleri@noaa.gov)>

Date: Wed, Mar 18, 2020 at 2:57 PM

Subject: following up re: Broadwater

To: Brian Wainger <[bwainger@kaleolegal.com](mailto:bwainger@kaleolegal.com)>, <[barger@gtlaw.com](mailto:barger@gtlaw.com)>

Cc: Porter, Kent (USAVAE) <[Kent.Porter@usdoj.gov](mailto:Kent.Porter@usdoj.gov)>

Hi Brian,

Did you get any clarification from your client about Broadwater's relationship, if any, with the company? As I mentioned on the phone, Broadwater has contacted a couple of NOAA folks who, to date (and to my knowledge), have not discussed Titanic with him. That said, if Broadwater has not entered into any formal/legal relationship with the company, then I want to know that so that our folks can be responsive without risking any accusations from RMST.

Thanks,

Jackie

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Deputy Chief

Oceans and Coasts Section

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National Oceanic and Atmospheric Administration

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